Document 67-2 Filed 08/04/25 Page 1 of 4 PageID #: 2132 Exhibit B Case 4:24-cv-00980-ALM

Defendant American Airlines, Inc.'s P.R. 4-3 Disclosures

I. U.S. Patent No. 8,332,844

Claim Term/Phrase	Construction	Intrinsic Evidence	Extrinsic Evidence
root image	a read-only base set of data	'844 Patent at Figs. 2, 3A-	The testimony of Dr. Michael
(claims 7 and 11)	blocks, operating beneath the	3B, 5; Abstract; 2:14-18;	Goodrich regarding the proper
	file system, that provide the	2:35-48; 2:61-63; 5:27-32;	construction of this term.
	common portion of the	5:40-58; 6:38-43; 7:26-37;	
	application environment	7:58-62; 8:13-15; 9:20-21;	
		9:39-49; 10:37-40.	

II. U.S. Patent No. 8,407,722

Claim Term/Phrase	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
input source	information provider and/or	'722 Patent at Figs. 1, 2, 3,	The testimony of Dr. Michael
(claim 14)	dynamic content provider	5, 7, 8, 10; Abstract; 3:15-	Goodrich regarding the proper
		18; 3:27-29; 3:39-46; 3:65-	construction of this term.
		4:1; 11:21-25; 11:38-57;	
		12:2-4; 12:8-13; 12:23-31;	
		13:17-23; 13:26-14:22;	
		15:42-50; 15:55-58; 16:60-	
		62; 17:36-44; 17:45-55;	
		18:3-11; 18:52-54; 18:66-	
		19:2; 19:14-18; 21:53-61;	
		21:62-67.	
identify a category of the update	identify a category of the	'722 Patent at 18:52-54;	The testimony of Dr. Michael
message based on the input	update message based on the	Reply Under 37 C.F.R. §	Goodrich regarding the proper
source	information provider or	1.116, February 9, 2012 at	construction of this term.
(claim 14)	dynamic content provider but	18-19; Brief on Appeal	
	not on the category/topic of	Under 37 C.F.R. § 41.37,	
	the message content	March 30, 2006 at 13-17.	

Document 67-2 Filed 08/04/25 Page 2 of 4 PageID #: 2133 Exhibit B Case 4:24-cv-00980-ALM

Defendant American Airlines, Inc.'s P.R. 4-3 Disclosures

III. U.S. Patent No. 7,949,785

Claim Term/Phrase	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
network address	Internet protocol or IP address	'785 Patent at Figs. 5A-5B,	Network Address, Computer-
(claims 30 and 37)		6B, 7, 21, 24-26; Abstract;	dictionary-online.org,
		1:38-50; 1:59-66; 4:20-22;	https://www.computer-
		4:47-54; 5:15-24; 5:51-57;	dictionary-
		9:13-17; 10:32-39; 10:42-	online.org/definitions-
		51; 12:8-17; 12:57-60;	<u>n/network-address.html</u> ("1. The
		13:6-9; 14:10-18; 14:34-	network portion of an IP address.
		15:16; 15:25-37; 26:1-5;	") (last visited July 14, 2025).
		26:39-43; 33:42-64.	
			Applicant Arguments/Remarks
			Made in an Amendment in
			response to Ex Parte
			Reexamination Non-Final
			Action, dated Jan. 8, 2025, at pg.
			12-13.
			The testimony of Dr. Michael
			Goodrich regarding the proper
			construction of this term.
network route director	a publicly addressable device	'785 Patent at Figs. 6B,	Applicant Arguments/Remarks
(claim 30)	configured to route	12B, 19; 10:24-31; 11:9-	Made in an Amendment in
	encapsulated packets to and	13; 13:28-32; 13:51-54;	response to Ex Parte
	from entities located in a	14:43-46; 15:6-15; 15:38-	Reexamination Non-Final
	private network portion of a	41; 20:61-65; 21:1-7;	Action, dated Jan. 8, 2025, at pg.
	virtual network	28:25-27; 32:23-37; 32:53-	19.
		62; 33:18-25.	The state of the s
			The testimony of Dr. Michael
			Goodrich regarding the proper
			construction of this term.

Document 67-2 Filed 08/04/25 Page 3 of 4 PageID #: 2134 Exhibit B Case 4:24-cv-00980-ALM

Defendant American Airlines, Inc.'s P.R. 4-3 Disclosures

IV. U.S. Patent No. 7,324,469

Claim Term/Phrase	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
a remote location a experiencing	a fixed remote location	469 Patent at Figs. 1-4;	Location, Merriam-Webster,
a relatively high volume of	experiencing a relatively high	1:34-56; 2:34-42; 3:43-67;	https://www.merriam-
transient traffic	volume of transient traffic	4:17-24; 5:4-7; 5:32-35;	webster.com/dictionary/location
		5:60-63; 6:7-10.	(last visited July 14, 2025).
(claim 24)			
			The testimony of Dr. Michael
			Goodrich regarding the proper
			construction of this term.
a relatively high volume of	Indefinite as to "relatively	469 Patent at 1:34-56;	The testimony of Dr. Michael
transient traffic	high" and "transient"	2:34-42; 3:1-23; 3:43-67;	Goodrich regarding the
(claim 24)		4:17-24.	indefiniteness of these terms.

Document 67-2 Filed 08/04/25 Page 4 of 4 PageID #: 2135 Exhibit B Case 4:24-cv-00980-ALM

Defendant American Airlines, Inc.'s P.R. 4-3 Disclosures

V. U.S. Patent No. 7,257,582

Claim Term/Phrase	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
partition	well-defined part of the input	'582 Patent at Figs. 1, 2, 3,	The testimony of Dr. Michael
(claim 1)	file	4; Abstract; 1:61-2:2; 2:5-	Goodrich regarding the proper
		12; 2:25-20; 3:22-63; 3:67-	construction of this term.
		4:3; 4:16-18; 4:52-55;	
		5:27-33; 5:34-38; 5:49-53;	
		5:60-6:3; 6:17-18; 6:38-40.	
descriptions of all of said	statements giving a	'582 Patent at 2:28-30;	description, Merriam-Webster,
partitions	characteristic(s) of all of the	3:13-2; 3:52-59; 3:64-67;	https://www.merriam-
(claim 1)	well-defined parts of the input	4:11-12; 4:16-21; 6:11-12;	webster.com/
	file for use in distributing the	First Amendment, March	dictionary/description ("b: a
	load without a special load	2, 2007, at 2; First	statement or account giving the
	process, wherein such	Amendment, March 2,	characteristics of someone or
	statements are distinct from	2007, at 7.	something") (last visited July 14,
	the input file itself		2025).
			The testimony of Dr. Michael
			Goodrich regarding the proper
			construction of this term.
on a first-come/first-served basis	selecting the earliest	'582 Patent at 1:61-2:2;	The testimony of Dr. Michael
(claim 1)	unprocessed partition for	2:8-11; 4:1-3; First	Goodrich regarding the proper
	execution without the use of a	Amendment, March 2,	construction of this term.
	control process that uses load	2007, at 6	
	information for such selection		
simultaneously executing at least	Indefinite		The testimony of Dr. Michael
a respective one of the subtasks			Goodrich regarding the
of the computer-executable			indefiniteness of this term.
process in each of at least some of			
said processors on a respective			
one of the partitions			
(claim 1)			